


EXHIBIT 2

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From: Ash Roozbehani persepolaw@gmail.com 
Subject: Re: MMAS Research LLC v. The Children's Corporation, et al., Case No. 1:24-cv-12108: Request for Extension to Respond
Date: February 24, 2025 at 6:02 AM
To: F. Christopher Austin chris@lextecnica.com
Cc: oczekjp@bsk.com, Alicia Perez Aperez@lextecnica.com, Patricia ray raypatricia@yahoo.com, Ronald Coleman rcoleman@colemanlaw-pc.com, Peter Hoeller phoeller@hoellerllc.com

AR

Good morning Attorney Austin,

Thanks for your call and email. At this time, we are not in a position to stipulate to an extension. Given that Defendants have been properly served and the response deadline has passed, we will be moving forward with a motion for default.

Best,
Ash

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From: "F. Christopher Austin" <chris@lextecnica.com>
Date: Saturday, February 22, 2025 at 10:28 PM
To: "persepolaw@gmail.com" <persepolaw@gmail.com>
Cc: "oczekjp@bsk.com" <oczekjp@bsk.com>, Alicia Perez <Aperez@lextecnica.com>
Subject: MMAS Research LLC v. The Children's Corporation, et al., Case No. 1:24-cv-12108: Request for Extension to Respond

Mr. Roozbehani:

As I mentioned in my earlier email, we are counsel for Defendants Dr. Morisky and MMAR, LLC in this matter, but as we are not licensed in MA, we are in the process of retaining Jeremy Oczek, of Bond Shoeneck & King to represent Defendants in this matter (copied).

Counsel will need additional time to assess the facts and prepare a response. Will you let me know Monday (Feb. 24th) whether you will stipulate to extend the time 14 days to March 5, 2025, for Defendants to response to the First Amended Complaint, or whether we will need to move for the same?

You are welcome to text or call me at the number below at your convenience to discuss. If you call, please text first so I know it is you.

Thank you,
Chris

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